IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

ELOISA MARQUEZ, RICHARD MARTINEZ,
DESTINEY MARTINEZ and ANDRELLITA MARTINEZ

Plaintiffs, Case No.: 1:15 CV 00787 KBM-LF

vs.

OFFICER NICHOLAS LEVINE, in his official capacity as
a commissioned law enforcement officer and individual capacity,
OFFICER RYAN KUEHL, in his official capacity as a
Commissioned law enforcement officer and individual capacity,
And the NEW MEXICO STATE POLICE DEPARTMENT,

Defendants.

JOINT MOTION TO DISMISS WITH PREJUDICE

COME NOW the Plaintiffs Eloisa Marquez, Richard Martinez, Destiney Martinez, and Andrellita Martinez, by and through their attorney, Murray Law Firm (Pilar Tirado Murray) and Defendants Officer Nicholas Levine, Officer Ryan Kuehl, and New Mexico State Police Department, by and through their attorneys SaucedoChavez, P.C. (Frank T. Apodaca), and pursuant to Rule 41(a)(2) jointly move for an Order dismissing the Plaintiffs' Complaint with prejudice.

As grounds for this Motion, the parties would show that all matters in controversy have been fully and finally resolved.

WHEREFORE, Plaintiffs and Defendants respectfully request that Plaintiffs' Complaint, as well as all causes of action therein, and any claims, demands, actions or causes of action which were or could have been asserted by Plaintiffs for alleged common law claims, federal claims, state law claims, and indemnity and contribution claims, be dismissed with prejudice, with the parties to bear their own costs and attorneys' fees.

Respectfully Submitted,

SAUCEDOCHAVEZ, P.C.

By: /s/ Frank T. Apodaca

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By: *Approved 6/30/2016*

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